

Exeter Local Plan

Examination

Matter 10: Transport, Travel and
Communications

Date at Examination: 13 May 2026

Devon County Council Position Statement

Statement Prepared: 22 April 2026

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1. Introduction

1.1. Purpose of this Statement

- 1.1.1. This statement has been prepared to answer the questions and address the associated issues as posed by the Planning Inspectors in relation to Matter 10 of the Exeter Local Plan (2022-2042) Examination.
- 1.1.2. This statement relates to questions 1 and 2, Issue 1 questions 1, 2, 3, 4, 5, 6 and 7, and Issue 2 questions 1, 2, 3, 4, 6 and 7 of Matter 10 (Transport, Travel and Communications).
- 1.1.3. It should be noted that this statement does not cover all of the questions raised by the Planning Inspectors in relation to Matter 10, but focuses upon those where Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities, in this case regarding the county council's role as Local Highway Authority.

2. Questions

2.1. Question 1

Has the preparation of the Local Plan been consistent with paragraph 108 of the Framework, which states that transport issues should be considered at the earliest stages of plan-making?

- 2.1.1. The preparation of the Exeter Local Plan has been consistent with paragraph 108 of the Framework, as transport issues were considered from the earliest stages of plan-making through early and ongoing engagement between DCC and Exeter City Council on the proposed strategic site allocations.
- 2.1.2. Strategic transport evidence was used to inform growth options, site selection and policy development. Early assessment focused on accessibility by walking, cycling and public transport, network performance, and opportunities to manage travel demand, rather than relying on additional highway capacity.
- 2.1.3. The Local Plan is aligned with national transport policy objectives set out in Gear Change, Bus Back Better and the National Transport Decarbonisation Plan, ensuring that national policy priorities for active travel, public transport and reduced car dependency have shaped Local Plan policies from the outset. This has also ensured that the Local Plan is well aligned with the Devon and Torbay Local Transport Plan, which utilises these national documents to underpin the local specific policies.
- 2.1.4. The Local Plan spatial strategy reflects Exeter's compact urban form and limited scope for new highway infrastructure, and directs growth towards brownfield and urban regeneration sites with good access to walking, cycling and public transport.

- 2.1.5. At the policy level, the Plan includes clear and robust criteria on accessibility, active travel, public transport, road safety and network management. In particular, Policies STC1–STC7 establish a strong modal hierarchy and require development to prioritise sustainable travel, consistent with paragraph 108 of the Framework and aligned with national, regional and local transport policy.
- 2.1.6. Transport impacts have been assessed and addressed at a strategic level at the earliest stage of plan making as part of the HELAA process. This is explained in the HELAA methodology (EVB-H-02e, paragraph 5.14, page 10).
- 2.1.7. Taken together, this demonstrates that transport issues influenced where and how development is planned, not merely how impacts are mitigated. The Local Plan has therefore been prepared in a manner consistent with paragraph 108 of the Framework.

2.2. Question 2

How has the Greater Exeter Transport Study and other key transport policy documents such as the Local Transport Plan and Exeter Transport Strategy been considered in the preparation of the Local Plan?

- 2.2.1. As explained in question 1, the preparation of the Exeter Local Plan has been informed by key adopted local transport policy, ensuring that transport objectives are integrated into the Plan's spatial strategy, policies and site allocations from an early stage.
- 2.2.2. In particular, the Exeter Transport Strategy (EVB-STC-04) has played a central role in shaping the Local Plan's approach to growth and movement. The Strategy establishes a clear ambition for 50% of trips to be made by walking and cycling by 2030, alongside a wider objective to reduce car dependency and support inclusive, low-carbon travel. These objectives are reflected in the Local Plan through policies that prioritise accessibility by sustainable modes, support compact and connected development patterns, and require high-quality walking, cycling and public transport provision. In this way, the Local Plan gives effect to the strategic objectives of the Exeter Transport Strategy – such as increasing the proportion of trips made by active modes – by translating them into development management expectations that apply across the plan area.
- 2.2.3. The Local Plan also reflects the principles and priorities of the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) (EVB-STC-03) which identifies priority corridors and interventions to improve active travel connectivity. The LCWIP has informed site-specific requirements and infrastructure priorities, including at strategic mixed-use brownfield allocations, and is reflected where relevant within the Infrastructure Delivery Plan (EVB-IF-02a), for example through contributions towards strategic cycle routes within the Water Lane development as identified in the Water Lane Supplementary Planning Document (EVB-S-03).

- 2.2.4. The Local Transport Plan for Devon (LTP4) (EVB-STC-01) provides the overarching, county-wide transport framework, bringing together national policy and place based strategies, including the Exeter Transport Strategy and LCWIP. Exeter is identified within the LTP4 as a key urban centre where growth must be accommodated through sustainable travel, demand management and efficient use of existing roads and networks. The Local Plan supports the objectives of LTP4 by aligning growth locations, policy requirements and infrastructure delivery with this strategic approach, and by building upon the transport interventions identified as necessary to support development in Exeter.
- 2.2.5. The Greater Exeter Transport Study: Mitigation modelling scenario 2 technical note (EVB-STC-017) builds on these adopted strategies by assessing the cumulative transport impacts of planned growth, including the implementation of Exeter Transport Strategy and LCWIP measures, and identifying additional mitigation where required. These additional measures were assessed within the strategic transport model to evidence that there are no severe impacts on the highway as a result of the Exeter Local Plan development.
- 2.2.6. Together, these adopted local transport strategies have ensured that transport considerations have influenced where development is located, how it is designed, and the infrastructure required to support it, rather than being addressed solely through mitigation at the planning application stage. This demonstrates a plan-led approach in which sustainable transport objectives have informed the Local Plan's preparation and content.

3. Issue 1 Questions

3.1. Issue 1 Question 1

How will the outcomes set out in Policy STC1 be implemented? Have these outcomes been adequately tested to ensure that they are viable and deliverable?

- 3.1.1. The outcomes in Policy STC1 will be delivered through the coordinated implementation of the Infrastructure Delivery Plan (IDP) (EVB-IF-02a), the Exeter LCWIP, (EVB-STC-03), the Bus Service Improvement Plan (BSIP) (EVB-STC-02), the movement frameworks developed through the Greater Exeter Transport Study (EVB-STC-017), and the LTP4 (EVB-STC-01), all of which set out specific active travel and movement corridors across the city and into neighbouring authorities, including strategic walking and cycling routes, bus improvement corridors and rail enhancements in and around Exeter.

- 3.1.2. The LCWIP and BSIP have been formally adopted by Devon County Council's Cabinet, providing a clear mandate for delivery. Devon County Council is committed to bringing forward the schemes identified within these strategies, with development-related contributions used to accelerate or prioritise delivery in line with the IDP. Furthermore, the LTP4 has been endorsed by Devon County Council's Cabinet and adopted by the Devon and Torbay Combined County Authority. This further demonstrates commitment and alignment between the authorities with responsibilities for Local Transport Authority powers.
- 3.1.3. An example of adequate testing can be shown through the Exeter LCWIP or BSIP where schemes have been prioritised using a multi-criteria assessment covering demand and cycling potential, safety, links to growth and development areas, feasibility, cost, and deliverability, alongside stakeholder and political support. This approach ensures that interventions are realistic, fundable and capable of being brought forward over time, providing a robust and viable mechanism for implementing Policy STC1 outcomes.
- 3.1.4. This approach has already supported delivery of high-quality infrastructure such as the E9 strategic cycling route (Magdalen Road), the E12 strategic cycling route (Rifford Road) and bus improvement schemes such as the improvements on New North Road in Exeter City Centre and the Heavitree Road bus priority system. The delivery of a multi-modal interchange at Honiton Road is a live project which the county council is working to deliver.
- 3.1.5. DCC has a strong track record of securing external investment and delivering sustainable travel infrastructure. The proposed allocations are intended to support delivery through financial contributions from development, alongside future funding from external funding sources via the Devon and Torbay Combined County Authority (DTCAA), subject to availability. While the cumulative costs of schemes identified in the LCWIP exceeds current funding allocations, delivery is expected to be phased and prioritised as funding opportunities arise.

3.2. Issue 1 Question 2

How has transport-related social exclusion been considered in the formulation of Policy STC1?

- 3.2.1. Whilst policy formulation is a matter for Exeter City Council, transport-related social exclusion has been considered by the county council. DCC embeds inclusive design across all transport strategies and infrastructure projects. Inclusive design ensures that schemes meet the needs of people of all ages, abilities and backgrounds and that barriers to movement—physical, social and economic—are minimised from the outset. Policy STC1 sets out a number of outcomes, which DCC can support and deliver through its transport functions for which examples are provided below.

- 3.2.2. All of the infrastructure schemes which the county council delivers use nationally recognised design guidance, including Manual for Streets, the Design Manual for Roads and Bridges, Traffic Signs Regulations and General Directions (TSRGD), and LTN 1/20 for walking and cycling as appropriate, and lately the guidance on floating bus stop design. These documents help ensure that routes and facilities are accessible, coherent and usable by a broad range of people, including those with mobility impairments, sensory impairments and non-standard cycles. Where appropriate, specialist sources such as Inclusive Mobility, Living Streets guidance and Wheels for Wellbeing are used to address specific accessibility considerations.
- 3.2.3. Engagement also plays a critical role in identifying and addressing transport barriers. Depending on the nature of the project, local stakeholder groups, disability forums, community organisations and national accessibility bodies are engaged to inform and refine scheme design. Public consultations are accessible in format and available both online and in hard copy on request, ensuring that people without internet access can participate. Statutory consultations for Traffic Regulation Orders further provide an opportunity for residents and community groups to comment on changes that may affect access or movement.
- 3.2.4. DCC undertakes proportionate Impact Assessments for schemes that contribute towards Policy STC1 outcomes. These assessments draw on Census data and national travel data to understand how different groups may be affected and to identify where design modifications may be needed to ensure fairness, accessibility and safety. For example, the design of the pedestrian and cycle bridge over the A379 at South West Exeter used graded ramps to ensure independent access for wheelchair users, people with pushchairs and people with limited mobility - illustrating how evidence and inclusive design principles shape delivery on the ground.
- 3.2.5. Overall, the approach ensures that considerations of social exclusion are embedded throughout the lifecycle of transport planning: from applying national guidance, to inclusive engagement, to assessing and mitigating impacts. This helps ensure that Policy STC1 supports a transport network that is accessible, equitable and beneficial for all communities.

3.3. Issue 1 Question 3

How have ecological connectivity and flood risk been considered in the formulation of Policy STC3?

- 3.3.1. Whilst policy formulation is a matter for Exeter City Council, the county council works proactively with all relevant parties to ensure that the expectations of the NPPF, with regard to the relationship between transport infrastructure, biodiversity, green infrastructure and flood risk, are met. The NPPF reflects expectations that plans should provide net gains for biodiversity and support coherent ecological networks (paragraph 186(d)), and that sustainable transport routes and green infrastructure form part of placemaking (paragraphs 108–117). While the policy was not written specifically for Water Lane, current projects in this location demonstrate how these principles are already being applied. For example, the Water Lane flood egress route incorporates safe evacuation alongside high-quality walking and cycling provision, reflecting the NPPF’s approach to managing flood risk through layout and design (paragraph 173), while integrating sustainable transport and green infrastructure objectives (paragraphs 108–117).

3.4. Issue 1 Question 4

How would the mobility hubs required by Policy STC4 be delivered?

- 3.4.1. A series of park and change/mobility hubs are being reviewed and developed for key corridors into the city and key development sites, including: A30/Honiton Road, A376/A3052/Sidmouth Road, Pinhoe Road, Cowley Bridge Road, West Exeter/Alphington Road, Bridge Road/Matford and strategic brownfield allocations. While several of these locations already operate in some form, the focus is on how they will function and evolve in the future to support sustainable travel objectives. For example, Honiton Road is currently undergoing design work, a mobility hub at Pinhoe Station has recently been completed, with further sites being investigated.
- 3.4.2. DCC is committed to supporting the expansion of shared mobility as part of its wider approach to reducing car dependency and increasing travel choice. DCC continues to promote carshare and bikeshare initiatives and has recently procured the services of a new car share company. It is also actively exploring delivery options to support the reintroduction of a viable and effective bike share scheme. This reflects DCC’s ongoing commitment to shared mobility as a key component of an integrated, accessible and low carbon transport network.
- 3.4.3. Multi-modal hubs can be designed to be location specific, with no one size fits all with regards to what needs to be included. Instead, a bespoke approach which considers the most appropriate modal links can be utilised, scaling the provision up or down as necessary subject to local demand.

3.5. Issue 1 Question 5

Are the requirements for major development set out in policies STC3 and STC4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 3.5.1. Policies STC3 and STC4 are justified, align with national policy, and are supported by up to date evidence. Paragraph 110 of the NPPF requires plans to provide attractive, well-designed walking and cycling networks, drawing on LCWIPs, and the policies reflect this requirement directly.
- 3.5.2. The transport criteria for major development have been positively prepared with the county council, as set out in the Statement of Common Ground (DTC-03b). The approach has already been tested through the Water Lane masterplan (EVB-S-02) and Supplementary Planning Document (EVB-S-03:), which identify a clear package of sustainable transport measures supported by transport assessment work and the Infrastructure Delivery Plan (EVB-IF-02a). This provides a robust template for other strategic sites.
- 3.5.3. The Devon County Council Empirical Data Report (2025) (EVB-STC-08a) shows that Exeter supports around 91,000 jobs and has one of the highest levels of net in-commuting nationally, yet exhibits a significantly lower car mode share (37%) than the Devon and South West averages (around 50%), reflecting its compact urban form and strong walking, cycling and public transport networks. This evidence demonstrates that major urban sites in Exeter are well suited to low-car development. Where car access and parking are intentionally limited, appropriate investment in walking, cycling and public transport is necessary to ensure residents can travel safely and conveniently without reliance on the private car.
- 3.5.4. The requirements have been tested through site-specific masterplanning, viability work, and the evidence base underpinning the LCWIP and Infrastructure Delivery Plan. This demonstrates that the sustainable transport measures required by Policies STC3 and STC4 are both achievable and deliverable within the development context in Exeter.

3.6. Issue 1 Question 6

How has access for emergency vehicles; carers; health visitors; medical professionals; social workers or others who need to use their cars and to park near where they are visiting been considered in the formulation of Policy STC5?

- 3.6.1. Policy STC5 allocates the provision for loading, unloading and deliveries within major developments. The policy also states that the levels of car parking and motorcycle parking should take into account the uses proposed. Therefore, developments should provide parking for emergency vehicles; carers; health visitors; medical professionals; social workers or others who need to use their cars and to park near where they are visiting as well as accessing any site. Policy STC5 also sets out that there is a requirement to ensure that: *“Car parking should be successfully integrated into the overall design of proposals by adopting suitable layouts...”*. All developments should ensure that there is sufficient access for all users especially the ones stated above. SMM63 of the schedule of suggested modifications (CSD-03) has also identified this and there is no objection to this inclusion within the policy to ensure the avoidance of any doubt.

3.7. Issue 1 Question 7

Are policies STC1, STC2, STC3, STC4, STC5 and STC6 positively prepared, justified, effective and consistent with national planning policy?

- 3.7.1. Policies STC1–STC6 are positively prepared through close joint working between Exeter City Council and Devon County Council. At Regulation 19 stage, Devon County Council expressed overall support for the sustainable transport and communications chapter and raised no objections to these policies, a position formally captured in the Statement of Common Ground. The policies are justified by a robust and up to date evidence base, including the Local Transport Plan 4 (EVB-STC-01), Local Cycling and Walking Infrastructure Plan (EVB-STC-03), Bus Service Improvement Plan (EVB-STC-02), Infrastructure Delivery Plan (EVB-IF-02a) and strategic transport modelling, which demonstrates that prioritising walking, cycling and public transport is the most appropriate strategy for Exeter in line with the Exeter Transport Strategy (EVB-STC-04) paragraphs 6.1 - 6.4 which states that the strategy focuses on creating greater places for people. They are effective because they establish a clear transport hierarchy and link directly to delivery through masterplanning and developer contributions, and they are consistent with national planning policy.

4. Issue 2 Questions

4.1. Issue 2 Question 1

Where strategic highway improvements have been identified as necessary, what amount of development can come forward in advance of their implementation? How has this been considered in the Council's Housing Trajectory?

- 4.1.1. No strategic highway improvements have been identified as necessary to accommodate the scale of development proposed in the Exeter Local Plan. Strategic transport modelling demonstrates that planned growth on the proposed sites can be supported without reliance on major highway capacity enhancements. This reflects the Plan's emphasis on low-car development and use of suitable alternative mitigation measures.
- 4.1.2. As a result, development is not constrained by the timing or delivery of strategic highway schemes. Instead, development contributions are directed towards measures that enable the movement of people via sustainable modes, which represent the most appropriate and effective mitigation strategy for Exeter. This approach has been embedded within the transport evidence base and Infrastructure Delivery Plan (EVB-IF-02a).

4.2. Issue 2 Question 2

How have the effects of development on the non-strategic (local) highway network been assessed as part of the plan-making process? Where highway mitigation is required, where is this set out and how will it be achieved?

- 4.2.1. The Exeter only scenario of the Greater Exeter Transport Study is discussed in the Greater Exeter Model update (EVB-STC-13b). This concludes that traffic flows are expected to reduce within Exeter due to people switching modes from private car to active travel and public transport. This additional capacity is then occupied by development outside of the city to give an overall consistent traffic flow (which has remained at the same level over the last two decades).
- 4.2.2. The study identifies five junctions on the eastern side of Exeter with the highest volume overcapacity. Further investigation of these junctions concluded that this was a result of background growth and development in the districts outside of Exeter, rather than associated with development allocated within the Exeter Local Plan.
- 4.2.3. Where junction assessments have concluded that mitigation is required, these have been included in the IDP (EVB-IF-02a). These specifically include the following, along with the more strategic elements included in the LCWIP (EVB-STC-03) and BSIP (EVB-STC-02):
- Ide Roundabout on the A30
 - Water Lane Active Travel Package
 - Highway enhancements on the A377 and level crossing at St. David's
 - Highway enhancements relating to Water Lane
 - South Gate highways reconfiguration.
- 4.2.4. Contributions towards or construction of these mitigation measures will be sought from developers as part of the planning application process. Some schemes will require funding packages from multiple sources, including the development contributions, as well as third parties and utilising DCC's transport capital programme. This is an approach that DCC has implemented on many successful schemes, such as the Rifford Road bi-directional cycle route.

4.3. Issue 2 Question 3

Should the disused railway line across the Marsh Barton site be included in Policy STC7?

- 4.3.1. The historic railway alignment was explored during the early stages of evidence gathering and was initially considered as a potential flood emergency egress route for the Water Lane SPD. Subsequent work undertaken by JBA, through the Water Lane Emergency Access and Egress Route Plan (EVB-CC-14a), identified the flood egress route across the canal and river as the preferred and most effective option. When considered as a standalone proposal, upgrading the disused railway line does not represent a viable or strategically important transport or emergency route. As such, it is not necessary for the disused railway alignment to be safeguarded within Policy STC7.

4.4. Issue 2 Question 4

What impact would the development of a new Motorway Service Area as supported by Policy STC8 have on junction 30 of the M5? What effect will the new service area have on the safe and efficient operation of the highway network?

- 4.4.1. In principle, a new motorway service area elsewhere along the Strategic Road Network (SRN) could have a beneficial effect by reducing the need for motorway traffic to access facilities via Junction 30 of the M5 which may help reduce pressure on the junction and associated local movements.
- 4.4.2. However, the impact on the safe and efficient operation of the highway network would depend on the scale and nature of the development. In the absence of detailed proposals, and particularly if the scheme were to include employment or other non-motorway uses, further transport assessment and traffic modelling would be required to fully understand its effects.

4.5. Issue 2 Question 6

Are the requirements set out in policies STC7, STC8 and STC9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 4.5.1. Policies STC7 and STC8 are justified, consistent with national planning policy and supported by a robust evidence base. They provide a proportionate and deliverable framework for safeguarding transport infrastructure and enabling sustainable transport measures, informed by strategic transport modelling and baseline evidence prepared by Devon County Council, including the Greater Exeter Model Update (EVB-STC-13b) and EVB-STC-08a: Exeter Transport Strategy – Transport Empirical Data Report. Delivery is intended to be achieved through safeguarding, development-led provision and partnership working, recognising that some elements are dependent on external funding and decisions beyond the Local Plan.

4.6. Issue 2 Question 7

Are policies STC7, STC8 and STC9 positively prepared, justified, effective and consistent with national planning policy?

- 4.6.1. The requirements in Policies STC7 and STC8 are justified, consistent with national planning policy and supported by a robust and up-to-date evidence base. Together, the policies provide a framework for safeguarding key transport infrastructure and enabling sustainable transport provision necessary to support planned growth. The requirements are justified by, and informed through, strategic transport modelling and baseline evidence prepared by Devon County Council, including the Greater Exeter Model Update (EVB-STC-13b) and EVB-STC-08a: Exeter Transport Strategy – Transport Empirical Data Report.

- 4.6.2. The policies align with national planning policy objectives set out in the National Planning Policy Framework 2023, including the safeguarding of land for transport infrastructure, the effective operation of the transport network and the promotion of sustainable transport modes. The requirements have been adequately tested and are deliverable through a combination of development-led provision, safeguarding mechanisms and partnership working, recognising that some elements of delivery will be subject to external funding availability and decisions beyond the direct control of the Local Plan for example where third party land is required.